

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

REDCELL CORP., and REDCELL
SYSTEMS, LLC,

Plaintiffs,

v.

A.J. TRUCCO, INC. and TRUCCONOVA,
LLC,

Defendants.

No. 1:20-cv-00018-JGLC-SLC

**DEFENDANTS' NOTICE OF MOTION *IN LIMINE* NO. 2
TO EXCLUDE PX-1, 2, 4-22, 24, 27, 29, 32, 33, 36, 38, 39, 43, 62, 66, 68, 75 AND THE
INTRODUCTION OR USE OF ANY "DISPUTED MATERIALS" NOT PRODUCED
DURING DISCOVERY FOR IMPEACHMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declaration of Lawrence Bluestone, Esq., with Exhibits, Defendants A.J. Trucco, Inc. and Truconova, LLC. ("Defendants") will move before the Hon. Jessica G.L. Clarke, U.S.D.J., at a date and time to be designated by the Court, for an Order, *in limine*, to exclude the introduction or use of any "disputed materials" not produced during discovery.

In accordance with the Court's Order, dated August 3, 2023 (Minute Entry) and Order dated November 2, 2023 (ECF No. 111), responses to Defendants' Motion *In Limine* shall be filed by November 20, 2023.

Dated: November 13, 2023
New York, NY

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Lawrence Bluestone
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